

NIKKI BOLLINGER GRAE, Individually and)
on Behalf of All Others Similarly Situated,)
)
Plaintiff,)
)
vs.)
)
CORRECTIONS CORPORATION OF)
AMERICA, et al.,)
)
Defendants.)
)
)
_____)

Civil Action No. 3:16-cv-02267

Honorable Aleta A. Trauger

Magistrate Judge Jeffrey S. Frensley

Pursuant to Rules 5.03 and 7.01 of the Civil Local Rules of Court, the Revised Stipulation and Protective Order entered in this case (ECF 86) (the “Protective Order”) and the Stipulation and Order Amending Protective Order to Protect Source Selection Information (ECF 177) (the “SSI Protective Order”), Defendants respectfully request the Court grant Defendants leave to file under seal the Reply Memorandum of Law in Further Support of Their Motion For Summary Judgment (the “Memorandum”) and the Response to Plaintiff’s Statement of Additional Material Facts that Present Genuine Issue To Be Tried (the “Response”). These two documents contain confidential information that the Court has previously sealed on the grounds that it was designated as Source Selection Information by the BOP. Defendants are concurrently filing versions of the Memorandum and Response with this confidential material redacted.

“[T]rial courts have always been afforded the power to seal their records when interests of [the litigant’s] privacy outweigh the public’s right to know.” *In re Knoxville News-Sentinel Co.*,